

MEMO ENDORSED

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September 13, 2023

**Via ECF and E-Mail**

Hon. Andrew L. Carter  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Barend Oberholzer*, 1:21-cr-00475-ALC**

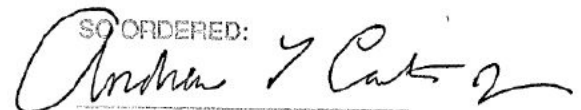
Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to seek a temporary modification to his bail conditions to allow him to travel to Washington, D.C. for business leaving September 16, 2023 and returning on September 21, 2023. If permitted to travel, Mr. Oberholzer will provide his Supervising Pretrial Officer with a complete itinerary.

By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500,000 personal recognizance bond secured by two financially responsible persons, with conditions including, *inter alia*, that Mr. Oberholzer's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, Mr. Oberholzer has remained compliant with the conditions of his release. With the Court's permission, Mr. Oberholzer has previously traveled for business and family vacation without incident.

The government takes no position on this application. We have reached out to Pretrial Services to get its position but have not heard back. It has previously taken no position of Mr. Oberholzer's prior requests to travel for business.

We thank the Court for its consideration in this matter.

SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE  
9/15/2023

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Respectfully submitted,

/s/ Ryan P. Poscablo  
Ryan P. Poscablo, Esq.

cc: Jilan J. Kamal, Esq., Assistant United States Attorney (be ECF)  
Domonique Jackson, Pretrial Services (by email)

So Ordered:

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Hon. Andrew L. Carter, Jr.